

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*
Plaintiffs,

Civ. Action No.: 14-cv-00029-AB

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,
Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

STIPULATION AND [PROPOSED] ORDER¹

This Stipulation and Agreement, dated January [14], 2016, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

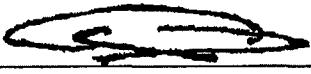
WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Player Roy Green (ECF No. 6533);

WHEREAS, Roy Green has since submitted a written request seeking to revoke his Opt Out request (*see Exhibit 1 (Declaration of Orran L. Brown, Sr.)*);

WHEREAS, the Parties have agreed to accept the revocation request submitted by Roy Green, subject to Court approval, because he submitted it before Opt Out litigation has commenced in this Court;

AND NOW, this [14] day of January, 2016, it is hereby stipulated and agreed by the Parties that the revocation request submitted by Roy Green is accepted, subject to Court approval, because he submitted it before Opt Out litigation has commenced in this Court.

It is so STIPULATED AND AGREED,

By: 

Date: 01/14/2016

Christopher Seeger
SEAGER WEISS LLP
77 Water Street
New York, NY 10005
Phone: (212) 584-0700
cseeger@seegerweiss.com

By: Brad S. Karp 

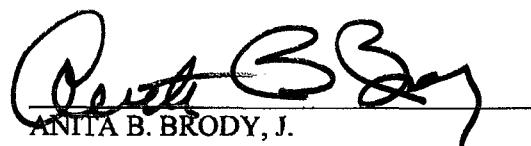
Date: 1/14/2016

Brad S. Karp
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Class Counsel

Counsel for the NFL Parties

It is so ORDERED, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation request submitted by Roy Green is approved and the Claims Administrator is DIRECTED to post a revised list of Opt Outs forthwith excluding Roy Green.



ANITA B. BRODY, J.

Copies VIA ECF on _____ to:

Copies MAILED on _____ to:

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE	:	No. 2:12-md-02323-AB
PLAYERS' CONCUSSION INJURY	:	
LITIGATION	:	MDL No. 2323
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THIS DOCUMENT RELATES TO:	:	Hon. Anita B. Brody
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ALL ACTIONS	:	
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DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC (“BrownGreer”), located at 250 Rocketts Way, Richmond, Virginia 23231.
2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
3. I submit this Declaration to describe an Opt Out revocation request that BrownGreer, as the Claims Administrator under the Class Action Settlement Agreement in this action (“Settlement Agreement”), received on January 12, 2016.
4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the 175 Opt Outs that were timely and included all elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (the “Opt Out List”), and a list of the 33 Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)’s required elements. Section 14.2(c) of the Settlement Agreement

provides that a Class Member who had opted out but wished to revoke that Opt Out could submit a written request to do so “[p]rior to the Final Approval Date.”

5. After the April 22, 2015 Final Approval Date, eight Class Members included on the Opt Out List as timely and complete submitted requests to revoke those Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval. The Parties and I reported the requests to the Court. By Orders of July 15, 2015 (Document 6642) and December 22, 2015 (Document 6713), the Court approved the revocation requests. As a result, we no longer counted those persons as Opt Outs and on each occasion posted on the Settlement website a revised Opt Out List identifying the remaining timely and complete Opt Outs remaining after the Court’s Order, which totaled 167 after the second Order.

6. On January 12, 2016, I received from Counsel for the NFL Parties a letter from Mr. Roy Green, a copy of which (with personal information redacted) is attached as Attachment 1 to this Declaration.

7. Mr. Green had submitted an Opt Out that was timely and complete. In his letter, Mr. Green requests that he be permitted to revoke this Opt Out.

8. The Parties to the Settlement Agreement have informed me that they agree to accept this revocation request, subject to Court approval.

9. If the Court grants its approval, we will remove this Opt Out from the list of timely complete Opt Outs and, upon direction of the Court, will post a revised Opt Out List identifying the remaining 166 timely and complete Opt Outs.

I, Orran L. Brown, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 14th day of January, 2016.



Orran L. Brown, Sr.

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Co-Lead Class Counsel
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New York, NY 10005

Sol Weiss
Co-Lead Class Counsel
ANAPOL SCHWARTZ
1710 Spruce Street
Philadelphia, PA 19103

Brad Karp
Counsel for the NFL Parties
Paul, Weiss, Rifkind, Wharton & Garrison, LLP
1285 Avenue of the Americas
New York, NY 10019

Re: REVOCATION OF OPT OUT FROM SETTLEMENT CLASS

Dear Counsel:

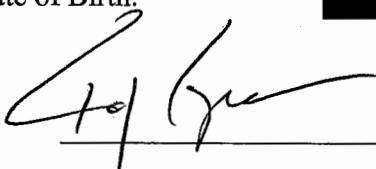
Please take notice that I, Roy Green, wish to revoke my request to be excluded from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323.

Name: Roy Green

Address:

Phone No.:

Date of Birth:

Signature: 

Print Name: Roy GREEN

Date: JAN 12, 2016

ATTACHMENT 1

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing document was served electronically via the Court's electronic filing system on the 14th day of January, 2016, upon all counsel of record.

Dated: January 14, 2016

/s/ Brad S. Karp

Brad S. Karp